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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRYAN M. WILLIAMS,

Defendant.

CASE NO. 1:24-CR-00199-JLT-SKO

UNITED STATES' SENTENCING
MEMORANDUM AND RESPONSE TO
OBJECTIONS

DATE: September 8, 2025
TIME: 9:00 am
COURT: Hon. Jennifer L. Thurston

I. INTRODUCTION

The United States of America, by and through Eric Grant, United States Attorney, and Jeffrey A. Spivak, Assistant United States Attorney, submits this sentencing memorandum for Defendant Briyan Williams. The United States requests the Court sentence Defendant to 15 months imprisonment, 3 years of supervised release, and a \$100 special assessment.

II. FACTUAL BACKGROUND

Defendant Bryan Williams served as the elected treasurer of the Kern County Republican Central Committee (the Central Committee) and the Kern County Young Republicans (Young Republicans) from 2012 to 2019. Presentence Investigation Report (PSR), ECF #14 at ¶ 6. During that period, Defendant stole nearly half a million dollars from the Central Committee and the Young Republicans. PSR ¶ 12. Defendant wrote checks to himself drawn on Central Committee and Young

1 Republicans bank accounts, and paid personal credit card expenses using on Central Committee and
2 Young Republicans bank account funds. PSR ¶¶ 5-12. For many of the checks he wrote, he
3 misrepresented the purpose of the checks to cause the banks to clear business checks which were used
4 for personal purposes. PSR ¶¶ 5-12.

5 III. SENTENCING POSITION

6 The United States requests the Court grant Defendant a two-level downward variance – from
7 total offense level 16 down to total offense level 14 – for extraordinary acceptance of responsibility.
8 When confronted by officials within the Central Committee in 2019, Defendant readily admitted his
9 guilty and made efforts to repay certain of the stolen funds. PSR ¶ 5. Defendant again openly admitted
10 his guilt to the FBI in 2022.

11 The United States believes that a low-end 15-month prison sentence is warranted and appropriate
12 in this case taking into account the nature and circumstances of the offense and the need for the sentence
13 imposed: to reflect the seriousness of the offense and promote respect for the law, and to provide just
14 punishment for the offense, and to afford adequate deterrence to criminal conduct. 18 U.S.C. § 3553.
15 Defendant served in a position of trust within the Committee and Young Republicans. He betrayed that
16 trust by stealing money from those entities, over a lengthy period of time. On the other hand, Defendant
17 has shown remorse, has readily accepted responsibility for his actions, and recognizes that what he did
18 was wrong.

19 IV. RESTITUTION

20 The United States is not seeking restitution on behalf of any victim.

21 V. RESPONSE TO DEFENDANT’S OBJECTIONS

22 **Defendant’s Objection #1** – Objection to Loss Amount.

23 The Defendant objects to the \$400,000 to \$500,000 loss amount calculated in the PSR.

24 **RESPONSE to Defendant’s Objection #1**

25 The FBI determined that Williams diverted approximately \$429,778.40. The FBI forensic
26 accountant’s report is attached hereto as Exhibit 1. In the report, the FBI analyzed the Central
27 Committee’s bank accounts, the Young Republican’s bank accounts, and Williams and his wife’s bank
28 accounts. The FBI determined that Williams diverted approximately \$429,778.40.

1 **Defendant's Objection #2** – Defendant voluntarily self-disclosed his misconduct.

2 **RESPONSE to Defendant's Objection #2**

3 The evidence contradicts this assertion. The FBI interviewed the former chairperson for the
4 Central Committee. The chairperson disputes that Defendant self-disclosed his misconduct. That
5 interview is attached hereto as Exhibit 2. In the interview, the chairperson indicated that the chairperson
6 pulled the Defendant into his/her office about the missing money. Thereafter, Defendant wrote a letter
7 admitting what he had done.

8 VI. CONCLUSION

9 For the reasons set forth herein, the United States requests the Court sentence Defendant Bryan
10 Williams to 15 months imprisonment, a 3 year term of supervised release, and \$100 special assessment.

11 Dated: September 2, 2025

ERIC GRANT
United States Attorney

13 By: /s/ JEFFREY A. SPIVAK
14 JEFFREY A. SPIVAK
Assistant United States Attorney